

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

RE:

RAFAEL ANTONIO RIVERA TOLEDO

Debtor

RE:

ELDALIZ RAMOS SANTIAGO

Debtor

CASE NO. 16-07825-BKT

CHAPTER 13

CASE NO. 16-07828-MCF

CHAPTER 13

JOINT MOTION FOR ORDER OF SUBSTANTIVE CONSOLIDATION

THE HONORABLE COURT:

COMES NOW, ROBERTO A. FIGUEROA COLON, attorney for the debtors named above, who represents and prays as follows:

1. The bankruptcy petition in number 16-07825-BKT was filed on September 30, 2016 and in case 16-07825- MCF the petition was filed also on September 30, 2016.
2. These two cases are related in the debtors RAFAEL ANTONIO RIVERA TOLEDO and ELDALIZ RAMOS SANTIAGO are currently living together as common-law spouses.
3. There is real and personal properties which are held in common ownership and which is scheduled in both cases. In addition, there are creditors who are parties in interest in both cases.
4. It is the best interest of the debtors' creditors and other parties in interest that the case be substantively consolidated so that they may be jointly administered in order to permit meetings, hearings and other events to be scheduled at the same time, in order to file a consolidated plan, and to reduce administrative costs to all parties in interest, as well as to this Honorable Court.

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JOINT MOTION FOR ORDER OF SUBSTANTIVE CONSOLIDATION
Rafael Antonio Rivera Toledo/16-07825-BKT
Eldaliz Ramos Santiago/16-07828-MCF

WHEREFORE, movant pays for an order of substantive consolidation of these two cases encompassing such terms as the Court may deem proper.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I **CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors in the above captioned cases, Rafael Antonio Rivera Toledo and Eldaliz Ramos Santiago; and to all creditors and parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 4th day of October, 2016.

/s/ Roberto A. Figueroa Colón
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Label Matrix for local noticing
0104-3
Case 16-07825-BKT13
District of Puerto Rico
Old San Juan
Tue Oct 4 13:48:07 AST 2016

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Mailable recipients 15
Bypassed recipients 0
Total 15

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0104-3
Case 16-07828-MCF13
District of Puerto Rico
Old San Juan
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